

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI**

UNITED STATES OF AMERICA,)
)
Plaintiff,)
) No.: 4:15-CR-00404 HEA/NAB
vs.)
)
OSCAR DILLON, III,)
Defendant.)
)

DEFENDANTS EMERGENCY UNOPPOSED
MOTION FOR A TEMPORARY FURLOUGH RELEASE

NOW COMES Defendant OSCAR DILLON, III, by and through one of his attorneys, DALTON LAW, LLC, and pursuant to 18 U.S.C. § 3622, respectfully requests that he be granted temporary release from pre-trial custody so that he may attend his grandmother's funeral on Friday, November 2, 2018. In support thereof, Mr. Dillon states as follows:

1. Mr. Dillon is currently in the custody of the Federal Bureau of Prisons (BOP), as a pre-trial detainee at Monroe County Jail in Waterloo, Illinois. He has been in custody since December 1, 2016.

2. Sadly, Mr. Dillon's grandmother, Vergie Mae Thomas, passed away late Friday, October 26, 2018.

3. The funeral service for Vergie Mae Thomas is scheduled for Friday, November 2, 2018, at approximately 11:00a.m.¹ The funeral service is set to begin

¹ A letter from Layne Mortuary, Inc confirming the same is attached hereto as Exhibit A.

at Austin A. Layne Mortuary, located at 7773 Natural Bridge Rd., Normandy, MO, and will continue on to Northern Missionary Baptist Church located at 3333 Clara Ave., St. Louis, MO.

4. Monroe County Jail is approximately 40 miles from Layne Mortuary, almost an hour away.

5. Under 18 U.S.C. § 3622, the B.O.P. “may release a prisoner from the place of his imprisonment for a limited period ... by authorizing him, under prescribed conditions to (a) visit a designated place for a period not to exceed thirty days, and then return to the same or another facility, for the purpose of ... (2) attending a funeral of a relative.”

6. At this time, Mr. Dillon respectfully requests that this Honorable Court grant him a temporary furlough release on Friday, November 2, 2018, starting at 6:00a.m. through 7:00p.m. so that he may attend and travel to and from his grandmother’s funeral.

7. Assistant United States Attorney Michael Reilly has indicated to the undersigned that the government does not oppose the instant motion put forth, subject to any positions and restrictions set forth by the U.S. Marshals Service and/or Pretrial Services.²

WHEREFORE, Defendant OSCAR DILLON, III, respectfully requests that this Honorable Court grant his motion and enter an Order granting Mr. Dillon a temporary furlough release from pre-trial custody on Friday, November 2, 2018

² AUSA Reilly has forwarded Mr. Dillon’s request to U.S.M.S. and Pretrial Services. He anticipates a response before Thursday, November 1, 2018.

from 6:00a.m. through 7:00p.m., subject to any positions and restrictions set forth by the U.S. Marshals and/or Pretrial Services, including that Mr. Dillon shall re-surrender himself to Monroe County Jail on Friday, November 2, 2018, no later than 7:00p.m.

Respectfully submitted,

/s/ Blaire C. Dalton
An Attorney for Oscar Dillon, III

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CERTIFICATE OF SERVICE

I hereby certify that on October 31, 2018, a true and correct copy of the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following: all Attorneys of record.

/s/ Blaire C. Dalton